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6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE DISTRICT OF NEVADA

8 THE BANK OF NEW YORK MELLON, fka )  
9 THE BANK OF NEW YORK, AS TRUSTEE ) Case No.2:17-cv-01242-JAD-VCF  
10 FOR THE CERTIFICATE HOLDERS )  
11 OF THE CWABS INC., ASSET-BACKED )  
12 CERTIFICATES, SERIES 2006-22 ) Removed from District Court, Clark  
County, NV, Case No. A-17-752593-C  
13 Plaintiff, )  
14 v. )  
15 NV MORTGAGE, INC. dba SOMA ) **STIPULATED JUDGMENT**  
16 FINANCIAL, et al. ) **DISCHARGING PROPERTY FROM**  
17 **FEDERAL TAX LIENS**  
18 Defendants. ) ECF No. 17

19 Plaintiff, THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK,  
20 AS TRUSTEE FOR THE CERTIFICATEHOLDERS OF THE CWABS INC., ASSET-BACKED  
21 CERTIFICATES, SERIES 2006-22 ("Plaintiff"), by and through its attorneys of record, the  
22 Fidelity National Law Group, Defendant UNITED STATES OF AMERICA (on behalf of  
23 the INTERNAL REVENUE SERVICE), by and through its attorney of record, Boris  
24 Kukso, Esq. of the U.S. Department of Justice, and Defendants NV MORTGAGE, INC.  
25

1 dba SOMA FINANCIAL, JONATHON DALE AMOS and MELISSA AMOS<sup>1</sup>, by and through  
2 their attorneys of record, Hitzke & Associates, hereby agree, stipulate, and request  
3 entry of judgment as follows:

4 **WHEREAS,**

5 This action involves the real property commonly known as 9601 Rolling Thunder  
6 Avenue, Las Vegas, Nevada 89148, and more particularly described as:

7 LOT FIFTY THREE (53) IN BLOCK THREE (3) OF SPINNAKER AT SOUTHWEST  
8 RANCH UNIT 3 AS SHOWN BY MAP THEREOF ON FILE IN BOOK 113 OF PLATS,  
9 PAGE 24, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY,  
10 NEVADA.

Assessor's Parcel Number: 163-31-811-047 (hereinafter, the "Property").

11 The United States claims an interest in the Property based on federal tax liens  
12 against Jonathon Amos and Melissa Amos (hereinafter, the "Subject Federal Tax  
13 Lien").

14 Specifically, the Subject Federal Tax Lien is the combined total of: (i) the tax lien  
15 against Jonathon Amos for unpaid federal income tax liabilities for tax year 2008 in the  
16 total amount of \$6,628.26, as of April 16, 2018; and (ii) the tax lien against Melissa Amos  
17 for unpaid federal income tax liabilities for tax year 2005 in the total amount of  
18 \$45,963.97, as of April 16, 2018. Notices of Federal Tax Lien are attached as Ex. 1.

19 Aside from the Subject Federal Tax Lien, the United States asserts no interest in  
20 the Property on account of any tax lien against Jonathon Amos or Melissa Amos.  
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25 <sup>1</sup> Melissa Amos is now known as Melissa Lambson. For purposes of this stipulation, she will be referred to as "Melissa Amos."

1 **THEREFORE**, the Parties hereby agree, stipulate and request entry of the following  
2 judgment:

- 3 1. That aside from the Subject Federal Tax Lien, the United States has no interest in  
4 the Property on account of any tax lien against Jonathon Amos or Melissa Amos.
- 5 2. That Plaintiff has paid the United States valuable consideration and in exchange,  
6 the United States DISCLAIMS any interest it may have in the Property based on  
7 the Subject Federal Tax Lien (the “Disclaimer”).
- 8 3. That this Judgment shall be recorded in the Official Records of Clark County,  
9 Nevada; that upon recording, the Judgment shall serve as notice of the  
10 Disclaimer; and that no other documentation is necessary to effectuate the  
11 Disclaimer.
- 12 4. That the Disclaimer applies only to the Property and shall not constitute a  
13 release of any tax liens against Jonathon Amos and Melissa Amos.
- 14 5. That the amount Plaintiff paid to the United States in consideration for the  
15 Disclaimer (the “Release Amount”) will be credited towards Jonathon Amos and  
16 Melissa Amos’ outstanding tax liabilities.
- 17 6. That Jonathon Amos may be responsible to Plaintiff for repayment of the  
18 Release Amount. In the event that Plaintiff seeks such repayment, it is expressly  
19 acknowledge by the Parties herein that this Judgment in no way waives any  
20 defenses, claims, counterclaims, or any other relief that Jonathon Amos and/or  
21 Soma Financial may have against Plaintiff or any entity related to Plaintiff which  
22 may seek repayment.
- 23 7. That the Complaint is dismissed in its entirety without prejudice.
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1 8. That each party shall bear their own attorney's fees and costs.

2 9. That Plaintiff's Notice of Lis Pendens, recorded against the Property on May 8,  
3 2017, as Instrument No. 20170508-0002232 of the Official Records of Clark  
4 County, Nevada, is hereby expunged.

5  
6 Dated: May 30, 2018

Dated: May 2, 2018

7 RICHARD E. ZUCKERMAN  
8 Principal Deputy Assistant Attorney  
General

FIDELITY NATIONAL LAW GROUP

9 /s/ Boris Kukso  
10 BORIS KUKSO  
11 U.S. Department of Justice  
P.O. Box 683  
12 Washington, D.C. 20044

/s/ Christina H. Wang  
CHRISTINA H. WANG, ESQ.  
Nevada Bar No. 9713  
1701 Village Center Circle, Suite 110  
Las Vegas, Nevada 89134

13 Of Counsel:  
DAYLE ELIESON  
14 US Attorney


*Attorneys for Plaintiff*

15 Dated: May 2, 2018

16 HITZKE & ASSOCIATES

17 /s/ Eric M. Ferran  
18 ERICK M. FERRAN, ESQ.  
19 Nevada Bar No. 9554  
20 2030 E. Flamingo Road, Suite 115  
Las Vegas, Nevada 89119  
*Attorneys for Defendants NV*  
*Mortgage, Inc. dba Soma Financial,*  
21 *Jonathan Dale Amos, and Melissa Amos*

22 **IT IS SO ORDERED. And the Clerk of Court is directed to ENTER JUDGMENT**  
23 **accordingly and CLOSE THIS CASE.**

24   
U.S. District Judge Jennifer A. Dorsey  
25 Dated: May 31, 2018